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January 25, 2017

Via ECF; Total Pages: 1

Hon. Edgardo Ramos, U.S.D.J.
U.S. District Court
40 Foley Square
New York, NY 10007

Re: Gualpa v. El Porron et al
Docket No. 1:16-cv-08950

Dear Judge Ramos:

This office represents Defendants in the above referenced matter. I am writing to request an adjournment of the mediation scheduled for January 30, 2017 at 10:00 a.m. to an alternate date. I have multiple conflicting matters scheduled on the same date that cannot be rescheduled. More importantly, I believe that a mediation will be more beneficial for the parties if it occurs after the Initial Conference and after the parties have had a chance to exchange relevant documents and information through some initial discovery. I have already addressed this issue with the mediation office but was advised to schedule it, and then request an adjournment with Your Honor thereafter if the parties are not ready to mediate for any reason. I have conferred with Plaintiff's counsel, and she does not consent to the adjournment. This is the first request for an adjournment in this matter.

In light of the foregoing, I respectfully request that the mediation be adjourned until all written discovery has been exchanged between the parties. Thank you for your kind courtesies in addressing this matter.

Respectfully submitted,

Michael K. Chong

Michael K. Chong, Esq.

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cc: All counsel;
SDNY Mediation Office